

Mr. Gerald Piper
Oil Technology, Inc. - Ispat Inland Steel Facility
1203 Sheffield Avenue
Dyer, Indiana 46311

Re: Minor Source Modification No:
089-11644-00369

Dear Mr. Piper:

Oil Technology, Inc. - Ispat Inland Steel Facility applied for a Part 70 operating permit on September 16, 1996, for a used oil recycling facility. An application to modify the source was received on December 13, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction and operation at the source:

- (a) One (1) 20,000 gallon tank for the processing of used oil generated by Ispat Inland Steel with a maximum throughput capacity of 5.475 million gallons per year and a batch process time of approximately 32 hours.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Autumn Marker or extension 3-0242, or dial (317) 233-0242.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

AMM

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Bob Simmons
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**Oil Technology, Inc. - Ispat Inland Steel Facility
3210 Watling Street
East Chicago, Indiana 46312**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 089-11644-00369	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary used oil recycling facility.

Responsible Official:	Mr. Gerald Piper
Source Address:	3210 Watling Street, East Chicago, Indiana 46312
Mailing Address:	1203 Sheffield Avenue, Dyer, Indiana 46311
Phone Number:	219-322-2724
SIC Code:	2999
County Location:	Lake County
County Status:	Nonattainment for PM ₁₀ , SO ₂ (portions only), ozone, and CO (portions only)
Source Status:	Attainment for all other criteria pollutants Part 70 Permit Program Major Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act 1 of the 28 listed source categories, 326 IAC 2-2 (One source with Ispat Inland Steel)

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) 20,000 gallon tank for the processing of used oil generated by Ispat Inland Steel with a maximum throughput capacity of 5.475 million gallons per year and a batch process time of approximately 32 hours.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.4 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.5 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.6 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.7 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the

response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.8 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) 20,000 gallon tank for the processing of used oil generated by Ispat Inland Steel with a maximum throughput capacity of 5.475 million gallons per year and a batch process time of approximately 32 hours.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 VOC Emissions [326 IAC 2-3]

Pursuant to 326 IAC 2-3 (Emission Offset), any change or modification that would result in an increase in the potential to emit of VOC emissions must receive prior approval from OAM.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.2 Record Keeping Requirements

-
- (a) in order to demonstrate that there has been no increase in the potential VOC emissions from the facility, a record shall be kept of the annual used oil throughput to the processing tank in gallons per year.
 - (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Oil Technology, Inc. - Ispat Inland Steel Facility
Source Address: 3210 Watling Street, East Chicago, Indiana 46312
Mailing Address: 1203 Sheffield Avenue, Dyer, Indiana 46311
Source Modification No.: T089-11644-00369

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification**

Source Background and Description

Source Name:	Oil Technology, Inc. - Ispat Inland Steel Facility
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake County
SIC Code:	2999
Operation Permit No.:	T 089-6579-00369
Operation Permit Issuance Date:	not yet issued
Minor Source Modification No.:	089-11644-00369
Permit Reviewer:	Autumn M. Marker

The Office of Air Management (OAM) has reviewed a modification application from Oil Technology, Inc., relating to the construction of the following emission units and pollution control devices:

- (a) One (1) 20,000 gallon tank for the processing of used oil generated by Ispat Inland Steel with a maximum throughput capacity of 5.475 million gallons per year and a batch process time of approximately 32 hours.

History

On December 13, 1999, Oil Technology, Inc. - Ispat Inland Steel Facility submitted an application to the OAM requesting to add a new used oil processing tank to their existing plant. Oil Technology, Inc. - Ispat Inland Steel Facility has not yet been issued a Part 70 permit. A Part 70 Permit application was submitted to IDEM - OAM on September 16, 1996.

Source Definition

Oil Technology, Inc. - Ispat Inland Steel Facility is a contractor located at the Ispat Inland Steel facility. It has been determined by IDEM, OAM, that the steel mill and the contractor are one source.

Enforcement Issue

There are no enforcement actions pending against Oil Technology, Inc.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 13, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	--
PM-10	--
SO ₂	--
VOC	3.639
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
Benzene	0.05
Toluene	0.18
Ethylbenzene	0.02
Xylene	0.91
Trichloroethene	0.03
Perchloroethene	0.02
Methyl Ethyl Ketone	0.02
TOTAL	1.23

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(10), a source in Lake County with the potential to emit twenty-five (25) tons per year of VOC and any modification that would result in an increase of greater than or equal to fifteen (15) pounds per day of VOCs. In this case Ispat Inland Steel has the potential to emit greater than twenty-five (25) tons per year of VOC and the new processing tank at Oil Technology has the potential to emit greater than 15 pounds per day. Therefore, Oil Technology, Inc. being part of Ispat Inland Steel is required to receive a Minor Source Modification because potential emissions from the proposed project are greater than 15 pounds per day. Since the Part 70 Permit has not yet been issued, this Minor Source Modification will give the source approval to construct and operate the new processing tank.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate nonattainment
SO ₂	nonattainment (portions only)
NO ₂	attainment
Ozone	severe nonattainment
CO	nonattainment (portions only)
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for PM₁₀, SO₂ (portions only), ozone, and CO (portions only). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Oil Technology, Inc. - ISPAT/Inland Steel Facility is not located in the nonattainment area for CO. The source is located in the nonattainment areas for SO₂.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	greater than 100
VOC	greater than 100
CO	greater than 100
NO _x	greater than 100

- (a) This existing source is a major stationary source because it is in one of the 28 listed source categories and at least one regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) These emissions were based on Ispat Inland Steel's Title V application. The status of the source is based on the entire Ispat Inland Steel Facility. The information above reflects emissions from the entire existing source not the emissions from Oil Technology, Inc. alone. Oil Technology, Inc. by itself is not a major source, but is considered one source with Ispat Inland Steel.

Proposed Modification

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
Proposed Modification	—	—	—	3.639	—	—
Contemporaneous Increases*: No. 5 Galvanizing Line Radiant Tube Furnace (1996), Vacuum Degasser(1999)				1.7 1.0		

Net Emissions	—	—	—	6.339	—	--
Emission Offset Significance Levels	25	15	40	25	100	40

*The contemporaneous increases above are from projects at Ispat Inland Steel. The No. 5 Galvanizing Line Radiant Tube Furnace project was permitted under approval 089-4940-00316. The Vacuum Degasser project was permitted under approval 089-10601-00316.

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) The VOC emissions are not limited. The potential VOC emissions are below the significance thresholds.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-089-6579-00369) application on September 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) The proposed processing tank is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because although the tank has a capacity between 75 cubic meters and 151 cubic meters the true vapor pressure of the liquid being stored is less than 15.0 kPa. Therefore, the requirements of 40 CFR 60.110b, Subpart Kb, are not applicable.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (BACT)

Potential emissions from the processing tank project are below 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply.

326 IAC 8-4 (Petroleum Sources)

Although the source is located in Lake County, the source does not meet the applicability requirements of 8-4-3. The capacity of the vessel is less than 39,000 gallons and the true vapor pressure of the volatile organic compound is below 1.52psi. Therefore, the requirements of 326 IAC 8-4 (Petroleum Sources) do not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This rule required source in Lake, Porter, Clark, and Floyd Counties to reduce the use of VOC containing materials or install an add-on control system on or before May 31, 1995. The date for the reduction of VOCs has passed. Therefore, the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) do not apply.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Although the source is located in Lake County, the source does not meet the applicability requirements. 326 IAC 8-9 applies to vessels that are used for storage of volatile organic liquids. The proposed tank is a processing tank not a storage tank. Therefore, the requirements or 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) do not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

There are no compliance monitoring conditions applicable to the proposed modification.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-11644-00369.

Appendix A

Emissions Calculations

Emission Unit: Process Tank

Basis:

Maximum Operating hours = 8,760 hours per year

Exit gas flow rate

Actual = 866 acfm
 Maximum = 7,700acfm

Assumptions:

- 1) The emissions are assumed to be continuous for the batch process
- 2) Scrubber is NOT federally enforceable, hence PTE is estimated using test data at the inlet
- 3) Emissions from stack testing of similar facility represents the emissions from this facility
- 4) For maximum operational flexibility, the emissions are estimated using 8,760 hours of operation
- 5) Acetone is exempt as a VOC
- 6) Molecular Weight of perchloroethene (166lb/lb-mol) is assumed to represent the Molecular Weight of all VOCs
- 7) Actual exit flow rate is based on scrubber specification, and max flow rate is in the absence of the scrubber, and hence due to blower alone.

Conversions:

1 ton = 2000 lb
 1 ppb = 0.001 ppm
 1 ppm = $\frac{M \times 10^{-6} \text{ lb/cu. ft}}{385.1}$
 (where M is the molecular weight of the compound)

Methodology:

Molecular weight of the VOCs = 166 lb/lb-mol

Total VOC emissions at:

Outlet = 4182 ppb
 Inlet = 5290 ppb

(Inlet and outlet are based on three tanks processing at one time exhausting through one stack. Therefore, the tons per year measurement will be divided by three in order to get the potential emissions from one processing tank.)

Emissions Estimation:

Potential to Emit

Exit gas flow rate = 7,700 acfm

Inlet concentration = 5290 ppb
 = 5.29 ppm
 = $2.27 \times 10^{-6} \text{ lb/cu.ft}$

= $2.27 \times 10^{-6} \text{ (lb/cu.ft)} \times 7700 \text{ (cu.ft/min)}$
 = 0.018 lb/min
 = 1.051 lb/hour

= $\frac{1.051 \text{ (lb/hr)} \times 8760 \text{ (hr/yr)}}{2000 \text{ (lbs/ton)}}$

= $\frac{4.602 \text{ tons per year}}{3 \text{ tanks}}$

= 1.534 tons per year

**Total VOC emissions
 from proposed tank**

VOC Emissions from TANKS program:

= 2.105 tons per year (based on a maximum tank capacity of 5.475 million gallons per year; 32 hour process/20,000 gallon tank)